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March 1, 2024

Honorable Steven I. Locke
United States District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722
By: ECF

RE: Nin and Trischler v. County of Suffolk et al
Docket No. 19-cv-01546 (GRB)(SIL), and
Passalacqua and Klein v. County of Suffolk et al
Docket No. 19-cv-05738 (GRB)(SIL)

Dear Judge Locke:

As the Court is aware, the undersigned has been assigned as pro bono counsel to Plaintiffs in each of the above actions. The parties write jointly to request that the conference scheduled for March 12, 2024 be adjourned as set forth below.

As the Court may recall, at the close of the last conference in January, the Court issued an electronic Civil Conference Minute Order (Docket Entry #159) which provided in pertinent part that:

The Court recognizes that incoming counsel for the County will need some time to get up to speed on these cases. It is the Court's intention to set a final set of discovery deadlines at the next conference and the parties should meet and confer prior to the conference in furtherance of this objective.

Pursuant to the Court's direction, the parties had a "meet and confer" on Wednesday afternoon. At that time, Arlene Zwilling advised that she will be leaving the Suffolk County Attorney's Office on March 15, 2024 and that her files for these cases have not yet been reassigned.

Based on the above, parties would respectfully request that the Conference scheduled for March 12, 2024 be adjourned to a date convenient for the Court during the week of April 1-5, 2024, so as to allow the parties to meet and confer with the replacement counsel for the Suffolk Defendants after Ms. Zwilling's retirement.

The parties thank the Court for its courtesies in this matter.

Respectfully Submitted,
HARFENIST KRAUT & PERLSTEIN, LLP

By: Ned Torczyner

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